

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIFE TECHNOLOGIES CORPORATION,)	
and)	
APPLIED BIOSYSTEMS, LLC,)	
)	
<i>Plaintiffs,</i>)	CIVIL ACTION NO. 2:09-cv-00283
)	
v.)	DEMAND FOR JURY TRIAL
)	
BIOSEARCH TECHNOLOGIES, INC.,)	
BIO-SYNTHESIS, INC.,)	
EUROFINS MWG OPERON INC., and)	
THE MIDLAND CERTIFIED REAGENT)	
COMPANY, INC.)	
)	

Defendants.

**SECOND JOINT MOTION FOR EXTENSION OF TIME TO
SUBMIT A PROPOSED PROTECTIVE ORDER**

The parties in the above-entitled and numbered civil action hereby move for an additional two week extension of time to submit a proposed protective order. The Court's Order dated June 10, 2010 (Document 89) currently requires the parties to submit a proposed protective order on June 23, 2010. The parties have made considerable progress in negotiating the language for a mutually agreeable protective order, and continue to believe that with the additional time an agreement on a proposed protective order can be reached without necessity of Court intervention.

WHEREFORE, PREMISES CONSIDERED, the parties request that this motion be granted and the parties be allowed a two week extension of time, until and including July 7, 2010, to submit a proposed protective order.

Dated: June 23, 2010

Respectfully submitted,

/s/ Daniel Johnson, Jr.

James L. Beebe (State Bar No. 24038708)
Winstol D. Carter, Jr.(State Bar No. 03932950)
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana Street, Suite 4000
Houston, Texas 77002
Tel: (713) 890-5000
Fax: (713) 890-5001
jbeebe@morganlewis.com
wcarter@morganlewis.com

Daniel Johnson, Jr.
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1596
Tel: (415) 442-1392
Fax: (415) 442-1001
djohnson@morganlewis.com

Attorneys for Defendant Biosearch Technologies, Inc.

/s/ Irena Rozyman

Richard Alan Sayles (State Bar No. 17697500)
Eve L. Henson (State Bar No. 00791462)
SAYLES WERBNER
1201 Elm Street
4400 Renaissance Tower
Dallas, TX 75270
Tel: (214) 939-8700
Fax: (214) 939-8787
dsayles@swtriallaw.com
ehenson@swtriallaw.com

Irena Rozyman
Eugene Martin Gelernter
PATTERSON, BELKNAP, WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036
Tel: (212) 336-2081
Fax: (212) 336-7936
iroyzman@pbwt.com
emgelernter@pbwt.com

Attorneys for Eurofins MWG Operon Inc.

/s/ David K. Wooten

Otis Carroll (State Bar No. 03895700)
Collin Maloney (State Bar No. 00794219)
IRELAND, CARROLL & KELLEY, PC
6101 S. Broadway, Suite 500
Tyler, TX 75703
Tel: (903) 561-1600
Fax: (903) 581-1071
Fedserv@icklaw.com

William B. Dawson (State Bar No. 05606300)
VINSON & ELKINS, LLP
3700 Trammell Crow Center
2001 Ross Avenue
Dallas, TX 75201-2975
Tel: (214) 220-7926
Fax: (214) 999-7926
bdawson@velaw.com

Tracey B. Davies (State Bar No. 24001858)
Margaret J. Sampson (State Bar No. 24027953)
VINSON & ELKINS, LLP
The Terrace 7
2801 Via Fortuna, Suite 100
Austin, TX 78746-7568
Tel: (512) 542-8400
Fax: (512) 542-8612
tdavies@velaw.com
msampson@velaw.com

David K. Wooten (State Bar No. 24033477)
Leisa Talbert Peschel (State Bar No. 24060414)
VINSON & ELKINS, LLP
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Tel: (713) 758-2095
Fax: (713) 615-5936
dwooten@velaw.com
lpeschel@velaw.com

Attorneys for Plaintiffs Life Technologies Corporation and Applied Biosystems, LLC

/s/ Thomas G. Jacks

Scott A. Meyer (State Bar No. 24013162)
Thomas G. Jacks (State Bar No. 24067681)
CHALKER FLORES, LLP
2711 LBJ Freeway, Suite 1036
Dallas, TX 75234
Tel: (214) 866-0001
Fax: (214) 866-0010
smeyer@chalkerflores.com
tjacks@chalkerflores.com

*Attorneys for Defendant The Midland
Certified Reagent Company, Inc.*

/s/ Nicole T. LeBoeuf

Nicole T. LeBoeuf (State Bar No. 00791091)
SHACKELFORD MELTON & MCKINLEY
3333 Lee Parkway
Tenth Floor
Dallas, Texas 75219
Tel: (214) 780-1400
Fax: (214) 780-1401
nleboeuf@shacklaw.net

Attorneys for Defendant Bio-Synthesis, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email and/or fax, on this the 23rd day of June, 2010.

/s/David K. Wooten